

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

FILED

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19K US DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA

v.

BIJAN RAFIEKIAN

and

KAMIL EKIM ALPTEKIN

Criminal Case No. 1:18-cr-457 (AJT)

NON-PARTY KRISTEN VERDERAME'S RULE 17(c)(2) MOTION TO QUASH

Non-party subpoena recipient Kristen Verderame, through counsel, respectfully requests that the Court quash Defendant Rafiekian's 17(c) subpoena, or in the alternative, issue an Order that both requires production of privileged materials pursuant to a Federal Rule of Evidence 502(d) order, and narrows the subpoena to materials directly relevant to refuting or confirming the charges put forth in the Indictment. The grounds for this motion are set forth in the accompanying memorandum of law.

March 15, 2019

KRISTEN VERDERAME
By counsel

/s/ Brandon J. Moss

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of March 2019, a true and correct copy of the foregoing document was served via email:

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